

EXHIBIT 55

EXHIBIT 55

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

LEIGHTON TECHNOLOGIES, LLC.)

plaintiff,)

vs.) Case No.

) 04 Civ. 02496 (CM)

OBERTHUR CARD SYSTEMS, S.A.)

and OBERTHUR CARD SYSTEMS)

OF AMERICA CORP.,)

defendants.)

(Volume III - pages 522 through 875)

Continued videotaped deposition of
KEITH LEIGHTON, a witness herein, called by the
defendants as if upon cross-examination, and
taken before David J. Collier, RPR, Notary
Public within and for the State of Ohio,
pursuant to Notice of Deposition and pursuant to
the further stipulations of counsel herein
contained, on Monday, the 23rd day of October,
2006 at 8:02 a.m., at the offices of Tackla &
Associates, 1020 Ohio Savings Plaza, City of
Cleveland, County of Cuyahoga and the State of
Ohio.

Tackla & Associates

ded677f5-dae1-4705-a501-e003c1d19420

1 goal, make this card smooth, and I succeeded in
2 doing it. They were happy with what I had
3 accomplished, because within a couple days I
4 come up with a smooth pre-lam inlay. They
5 wanted me to use their laminator that had four
6 daylight openings in the laminator to produce
7 these cards. They wanted me in our first
8 agreement to be able to get into production
9 using all four daylight openings, and after
10 producing this first card they stopped me from
11 working on that card and said, we want you to do
12 the larger card.

13 Q Okay. And, I'm sorry, why --

14 A Here was a week that had already gone by.

15 Q Right. But "unfair" is an interesting
16 word. I'm trying to understand. You were a
17 consultant, right?

18 A Right.

19 Q They were paying you for your time and
20 effort?

21 A That's correct.

22 Q And they were paying you to consult with
23 them on the issues that --

24 A In a 30 day period, produce 10,000 cards.

25 Q Okay. And did they want you to produce

EXHIBIT 56

EXHIBIT 57



3041 ORCHARD PARKWAY • SAN JOSE, CA 95134-3017

No. 206436

VOUCHER NUMBER	DATE	NUMBER	AMOUNT	DISCOUNT	PAYMENT AMOUNT
136400	4/7/95	S950747	1875.00		1875.00
				TOTAL AMOUNT PAID	1875.00

Trial Counsel's Eyes Only

L06618

EXHIBIT 58

Keith Leighton
2817 Fulmer
Lorain, OH 44053

May 19, 1995

MOTOROLA INDALA CORPORATION
3041 Orchard Parkway
San Jose, CA 94134-2017

ATTENTION: KEN THOMPSON

Dear Ken:

It was a pleasure working at Motorola Indala to promote the manufacture of the ISO format card with embedded electronic RFID's to a surface flatness of 0.0005" for dye sublimation printing.

The production of 10,000 cards was delayed one week because of the following reasons:

- * After I perfected the process on the small coil, you requested me to do the same on a large coil, which was not originally agreed to.
- * You did not have the large coils available for me to test, which slowed testing time.
- * The laminator had deficiencies which caused break-downs, slowing testing time and spoiling work in process.
- * Laminating plates requested my first week at Motorola were not ordered until the end of my third week at Motorola, which slowed testing.
- * You requested me to produce 10,000 coils, but the coils were not available to produce.

If the above problems, which were no fault of mine, had not been encountered, the production of 10,000 cards would have been completed in less than 30 working days, as originally planned.

Let me know when I can be of further help to you.

Best regards,


Keith Leighton

KL:1
Enclosure: Invoice #09755
Copy to: Jean-Marc Delbecq
Noel Eberhard

408 38

Trial Counsel's Eyes Only

L04427

EXHIBIT 59

****Deliverables Keith Leighton to Motorola Indala for Services (re-sent 3/21/95)****

The items to be included in quote as basis for payment must include the following deliverables:

1. Materials

- a. complete specification of all materials to include thicknesses and tolerances, chemical make-up, vendor, part number, sizes
No documented report, Bill of Material, print, or chemical specifications supplied by Keith.
- b. incoming inspection procedure for material
No documented procedure supplied by Keith.
- c. handling and storage requirements for materials, conditioning if necessary
N/A.
- d. lot traceability procedure for materials
N/A.

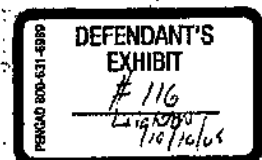
2. Process

- a. complete processes specification for producing PVC cards at .038" \pm .004" with a surface flatness (1 side) of <0.0005" at less than 40 minutes per cycle
Process supplied yielded 0.046" to 0.048" at less than 40% yield for electrical and cosmetic quality.
- b. PVC lamination process to achieve flatness or homogenization of PVC lamination and post-process cold lamination (or gluing) of PVC top, printable layer
Not Attempted.
- c. process to be developed with final outcome of using 4 cassette books and 5-12 layers per book
Done.
- d. Quality control process for documentation of lamination process on each lot with future traceability
N/A.
- e. Data compiled for flatness vs. material and process used
Not Done.

3. Equipment / Monitoring Equipment / Test Equipment

- a. Procedure for lamination press operation
No written procedure supplied by Keith.
- b. Static discharge equipment requirement for laminated sheets
No requirements document supplied for Keith.
- c. Specifications for cassette design, mirror plate, source, press pads, and press plates
Some specifications supplied but process was a moving target. MI could not source over \$10,000 worth of tooling for an unstable process.
- d. Process monitoring tooling needed for tracking of lamination performance to lot
N/A.
- e. Specification and setup of test equipment on laminated product
Not Done.
- f. Preventive maintenance specification for lamination equipment and tooling
Not Done.

4. Product



Motorola / Indala Ken Thompson

408 385 7941

2007/12/05

3:53 PM

2/4

a. Manufacture of ISO format card with embedded electronic RFID's to a surface flatness of 0.0005" for dye sublimation printing.

Process given to Motorola Indala after 5 weeks of development yielded below 24% on runs of over 4,000 card sites. Evolving process, materials, and tooling did not allow sufficient time within the 4 weeks to produce a stable, or acceptable process.

b. Production of > 10,000 cards using process, tooling, and material identified within 4 weeks along with all above items to receive bonus amount of \$1,500.00

Process given to Motorola Indala after 5 weeks of development yielded below 24% on runs of over 4,000 card sites. Evolving process, materials, and tooling did not allow sufficient time within the 4 weeks to produce a stable, or acceptable process. Motorola Indala does not consider the 24% yield to be a "production process". Due to unstable process development, MI would not commit to > \$10,000 worth of tooling until a "production process" was identified.

During those 4 weeks, the laminating press was inoperable for 3 days and Keith missed a total of 2.5 days of work. \$1,500 was issued to Keith for the 5th week of work. \$375 was issued to Keith on P.O. #950747 dated 6/22.

Signed: Keith Leighton _____ Date: _____

Ken Thompson _____ Date: _____

EXHIBIT 60

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

- - - - -

LEIGHTON TECHNOLOGIES, LLC,)	Case No.
Plaintiff and)	04 Civ. 02496
Counterclaim Defendant,)	
v.)	
OBERTHUR CARD SYSTEMS, S.A., AND)	
OBERTHUR CARD SYSTEMS OF)	
AMERICA CORPORATION,)	
Defendants and)	
Counterclaim Plaintiffs)	

- - - - -

CONFIDENTIAL

DEPOSITION OF JEAN-MARC DELBECQ

WEDNESDAY, MARCH 22, 2006

PAGES 151 - 308; VOLUME 2

BY: CHRISTINE L. JORDAN, CSR NO. 12262

1 Number two, do you recall whether Leighton
2 ever provided Indala any of the items listed under
3 number two?

4 (The witness reviews the document.)

5 THE WITNESS: I recall that Keith Leighton
6 did not deliver the items listed in item two or that
7 if -- if he claimed to have, the results were not
8 reproducible in a sufficiently -- in a -- of a
9 sufficient quality to be called a -- a deliverable.

10 BY MR. J. JACOBS:

11 Q. How about items under number three, did he
12 provide Indala with the items under number three?

13 (The witness reviews the document.)

14 THE WITNESS: I do not recall Keith Leighton
15 providing Indala the items in number three except the
16 specifications for cassette design, mirror plate,
17 source press pads and press plates.

18 I do recall getting some contacts from Keith
19 Leighton and -- and buying some plates or deciding that
20 his -- actually, probably what I really remember is
21 that, after talking to his contacts, we decided that
22 there really wasn't a lot of value and we went and we
23 sourced them in other places.

24 But one of the things I think that Keith
25 Leighton as, you know, he presented him -- represented

1 himself to Indala as a laminating expert had, we think,
2 were contacts in the industry. And so part of -- part
3 of three was really, you know, who can we talk to to
4 get certain stuff.

5 But I am sure that there was no static
6 discharge from Keith, 3B.

7 I'm fairly sure that I can say he did not
8 give us 3A, a procedure for running the press.

9 I -- I can say with some confidence he didn't
10 give us any preventive maintenance specifications -- I
11 don't even remember Keith Leighton giving us any
12 documentation. In fact, what you've shown me, which
13 are things that I've drawn, is the way that we got the
14 documentation.

15 We sat down and we said, Look, you know, what
16 do you know? And then we put it up on the white board.
17 That was more how we got anything of documentation from
18 Keith.

19 BY MR. J. JACOBS:

20 Q. How about on number four, did Indala receive
21 those deliverables listed under four?

22 (The witness reviews the document.)

23 THE WITNESS: We did not receive that from
24 Keith Leighton.

25 MR. J. JACOBS: Let's mark as the next

EXHIBIT 61

Keith Leighton
2817 Fulmer Rd
Lorain, Oh 44053

July 17, 1995

Plastag Corporation
5990 North Norwest Highway
Chicago, Illinois 60631

Dear Dave:

We made an agreement that I would give you my proven technology to produce a full bleed laminated plastic card for a consultant fee of \$8000. I did not agree to work by the hour because I have already invested many hours in research and development to produce my technology. I decided to give this technology to any plastic card manufacturer who requested it for a consultant fee of \$8000.

The \$8000 fee is justified because I saved you thousands of dollars: by giving you proven technology in four days that took me weeks of research and development paid for by other plastic card companies - and they are successfully using this same technology today.

You said you had the same ink that I brought in; however, the technology I gave you involved more than just ink! It involved increased time in the laminator and also an alcohol free process. I used more than just ink and **GAVE YOU THE TECHNOLOGY I PROMISED YOU.** Mitch said, in our presence, that my results exceeded ISO standards and was better than anything Plastag previously developed. I **DID GIVE YOU THE RESULTS I PROMISED YOU!** Please send me the \$4000 you promised to pay me.

Before I left Plastag I gave you a formula without using alcohol, not including an alcohol substitute. This formula produced **SUCCESSFUL RESULTS** - check your sample sheets. This formula, contrary to what Frank Schneider said, worked on all U.V. colors. However, you wanted the PMS 185 to be a stronger red color, so you ordered a stronger PMS 185 to be tested after I left.

On Friday, June 2nd, my last day at Plastag, you said that you would test the PMS 185 within two weeks and if the results proved successful you would pay me the balance of \$4000 within the two weeks. You said -- "These people here are my witness, I will pay you within two weeks, I am a man of my word." According to Bill Kraft, the test on the PMS 185 wasn't made until July 14th, one and one-half months later. It proved to be successful because all PMS colors (except metallic) work using my proven formula.

Frank Schneider said the alcohol free substitute doesn't work that well. How could he know when in fact (according to Bill Kraft) you haven't even tested an alcohol free substitute yet? On July 13th Bill Kraft told me he was having the ROSO people come in to work with him to formulate an alcohol free substitute.

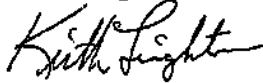
Page 2

July 17, 1995

I have provided you with the same technology that I gave to Rainbow Printing and other companies. They tell me that they are happy with the results.

I have other plastic card innovations I would like to share with you because I believe you would be interested. One is a RF-ID card with a thickness of .032" which I am planning to have patented.

Best Regards,


A handwritten signature in cursive script, appearing to read "Keith Leighton".

Keith Leighton

P.S. CONSIDER THIS:

I showed you and Frank that it is not necessary to apply adhesive on split core stock. Frank told me that by eliminating the adhesive the money saved would pay for a family of six to live for one year. I did not charge you for this valuable recommendation.

EXHIBIT 62

	Subclass	ISSUE CLASSIFICATION						
	Class							
PROVISIONAL APPLICATION NUMBER 60/005,685								
SERIAL NUMBER 60/005,685 PROVISIONAL	FILED DATE 10/17/95	CLASS	SUBCLASS	GROUP ART UNIT	EXAMINER			
APPLICANT'S KEITH R. LEIGHTON, LORAIN, OH. **CONTINUING DATA***** VERIFIED **FOREIGN/PCT APPLICATIONS***** VERIFIED FOREIGN FILING LICENSE GRANTED 12/14/95 ***** SMALL ENTITY *****								
Foreign priority claimed <input type="checkbox"/> yes <input type="checkbox"/> no 35 USC 119 conditions met <input type="checkbox"/> yes <input type="checkbox"/> no Verified and Acknowledged <u>Examiner's Initials</u>		AS FILED →	STATE OR COUNTRY OH	SHEETS DRWGS. 6	TOTAL CLAIMS 	INDEP. CLAIMS 	FILING FEE RECEIVED \$75.00	ATTORNEY'S DOCKET NO. 6014-GEN
ADDRESS STEVEN M HAAS 1225 WEST MARKET STREET AKRON OH 44313-7188		TITLE PROCESS FOR THE MANUFACTURE OF RADIO FREQUENCY IDENTIFICATION CARDS						
U.S. DEPT. OF COMM./PAT. & TM.—PTO-456L (Rev. 12-94)								

Form PTO-1625
(Rev. 5/95)

(FACE)

11/16/05

PATENT APPLICATION



60005625

APPROVED FOR LICENSE



INITIALS

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1.	Application papers	
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EXAMINER		E42	12/3/98
TYPIST		36	12/14
VERIFIER		330	2-14
CORPS CORR.			
SPEC. HAND			
FILE MAINT			
DRAFTING			




(RIGHT OUTSIDE)

60/005685

PATENT APPLICATION SERIAL NO. _____

U.S. DEPARTMENT OF COMMERCE
PATENT AND TRADEMARK OFFICE
FEE RECORD SHEET

BAR CODE LABEL 		U.S. PATENT APPLICATION			
SERIAL NUMBER 60/005,685 PROVISIONAL		FILING DATE 10/17/95	CLASS	GROUP ART UNIT	
APPLICANT	KEITH R. LEIGHTON, LORAIN, OH. **CONTINUING DATA***** VERIFIED <hr/>				
	FOREIGN/PCT APPLICATIONS*** VERIFIED <hr/>				
	FOREIGN FILING LICENSE GRANTED 12/14/95				
STATE OR COUNTRY OH		SHEETS DRAWING 6	TOTAL CLAIMS	INDEPENDENT CLAIMS	FILING FEE RECEIVED \$75.00
		ATTORNEY DOCKET NO. 6014-GEN			
ADDRESS	STEVEN M HAAS 1225 WEST MARKET STREET AKRON OH 44313-7188				
	TITLE PROCESS FOR THE MANUFACTURE OF RADIO FREQUENCY IDENTIFICATION CARDS				
This is to certify that annexed hereto is a true copy from the records of the United States Patent and Trademark Office of the application which is identified above. By authority of the COMMISSIONER OF PATENTS AND TRADEMARKS					
Date		Certifying Officer			



Attorney's Docket No. 75. 214 PATENT

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

A/Prov.
607005685

application of: Keith R. Leighton

For: PROCESS FOR THE MANUFACTURE OF RADIO FREQUENCY IDENTIFICATION CARDS

Box Provisional Patent Application
Commissioner of Patents and Trademarks
Washington, D.C. 20231

COVER SHEET FOR FILING PROVISIONAL APPLICATION
(37 C.F.R. § 1.51(2)(i))

WARNING: "A provisional application must also include a cover sheet identifying the application as a provisional application. Otherwise, the application will be treated as an application filed under § 1.53(b)(1)." 37 C.F.R. § 1.53(b)(2)(i).

NOTE: "A complete provisional application does not require claims since no examination on the merits will be given to a provisional application. However, provisional applications may be filed with one or more claims as part of the application. Nevertheless, no additional claim fee or multiple dependent claims fee will be required in a provisional application." Notice of December 5, 1994, 59 FR 63951, at 63953.

"Any claim filed with a provisional application will, of course, be considered part of the original provisional application disclosure." Notice of April 14, 1995, 60 Fed. Reg. 20,185, at 20,209.

NOTE: "A provisional application shall not be entitled to the right of priority under § 1.55 or 35 U.S.C. 119 or 365(a) or to the benefit of an earlier filing date under § 1.78 or 35 U.S.C. 120, 121 or 365(c) of any other application." 37 C.F.R. § 1.53(b)(2)(ii).

NOTE: "No information disclosure statement may be filed in a provisional application." 37 C.F.R. § 1.51(2)(b). "Any information disclosure statements filed in a provisional application would either be returned or disposed of at the convenience of the Office." Notice of December 5, 1994, 59 FR 63581, at 63594.

NOTE: "No amendment other than to make the provisional application comply with all applicable regulations, may be made to the provisional application after the filing date of the provisional application." 37 C.F.R. § 1.53(b)(2).

CERTIFICATION UNDER 37 CFR 1.10

I hereby certify that this correspondence and the documents referred to as attached therein are being deposited with the United States Postal Service on OCTOBER 17, 1995 (date), in an envelope as "EXPRESS MAIL, POST OFFICE TO ADDRESSEE" service under 37 C.F.R. 1.10, Mailing Label Number JM222520082US addressed to the: Commissioner of Patents and Trademarks, Washington, D.C. 20231.

Kathryn E. Palguta
Signature

Kathryn E. Palguta

(type or print name of person certifying)

NOTE: Each paper or fee filed by "Express Mail" must have the number of the "Express Mail" mailing label placed thereon prior to mailing. (37 C.F.R. 1.10(b))

WARNING: Certificate of mailing (first class) or facsimile transmission procedures of 37 CFR 1.8(a) cannot be used to obtain a date of mailing or transmission for this correspondence. 37 C.F.R. 1.8(a)(4)(A)

(Cover Sheet for Filing Provisional Application [23-1]—page 1 of 5)

WARNING: A provisional application may be abandoned by operation of 35 U.S.C. §(5) on a Saturday, Sunday, or Federal holiday within the District of Columbia, in which case, a nonprovisional application claiming benefit of the provisional application under 35 U.S.C. 119(e) must be filed no later than the preceding day that is not a Saturday, Sunday, or Federal holiday within the District of Columbia. Notice of April 14, 1995, 60 Fed. Reg. 20,195 at 20,202.

1. The accompanying application is a provisional application. (37 C.F.R. § 1.51(a)(2)(i)(A))
2. The name(s) of the inventor(s) is/are (37 C.F.R. § 1.51(a)(2)(i)(B)):

NOTE: While the name or names of the inventors are required in order to record a provisional application a filing date, a provisional application is not required to be signed by the inventor or the assignee. No oath or declaration is required. Presumably, most provisional applications will be filed by a registered practitioner without a power of attorney being filed. Notice of December 8, 1994, 59 FR 63561, at 63594.

NOTE: "The naming of inventors for obtaining a filing date for a provisional application is the same as for other applications. A provisional application filed with the inventors identified as 'Jones et al.' will not be accorded a filing date earlier than the date upon which the name of each inventor is supplied unless a petition with the fee set forth in § 1.17(f) is filed which sets forth the reasons the delay in supplying the names should be excused. Administrative oversight is an acceptable reason. It should be noted that for a 35 U.S.C. 111(a) application to be entitled to claim the benefit of the filing date of a provisional application the 35 U.S.C. 111(a)(1) application must have at least one inventor in common with the provisional application." Notice of April 14, 1995, 60 Fed. Reg. 20,195, at 20,209.

The term "invention" is typically used to refer to subject matter which applicant is claiming in his/her application. Because claims are not required in a provisional application, it would not be appropriate to reference joint inventors as those who have made a contribution to the "invention" disclosed in the provisional application. If the "invention" has not been determined in the provisional application because no claims have been presented, then the name(s) of those person(s) who have made a contribution to the subject matter disclosed in the provisional application should be submitted. Section 1.45(c) states that "If multiple inventors are named in a provisional application, each named inventor must have made a contribution, individually or jointly, to the subject matter disclosed in the provisional application." All that § 1.45(c) requires is that if someone is named as an inventor, that person must have made a contribution to the subject matter disclosed in the provisional application. When applicant has determined what the invention is by the filing of the 35 U.S.C. 111(a) application, that is the time when the correct inventors must be named. The 35 U.S.C. 111(a) application must have an inventor in common with the provisional application in order for the 35 U.S.C. 111(a) application to be entitled to claim the benefit of the provisional application under 35 U.S.C. 119(e). Notice of April 14, 1995, 60 Fed. Reg. 20,195, at 20,208.

"If all the names of the actual inventor or inventors are not supplied when the specification and any required drawings are filed, the provisional application will not be given a filing date earlier than the date upon which the names are supplied unless a petition, with the fee set forth in § 1.17(g), is filed, which sets forth the reasons for the delay in supplying the names should be excused." 37 C.F.R. § 1.53(b)(2).

1. Keith R. Leighton
(GIVEN NAME) (MIDDLE INITIAL OR NAME) (FAMILY (OR LAST) NAME)

2. _____
(GIVEN NAME) (MIDDLE INITIAL OR NAME) (FAMILY (OR LAST) NAME)

3. _____
(GIVEN NAME) (MIDDLE INITIAL OR NAME) (FAMILY (OR LAST) NAME)

3. Address(es) of the inventor(s), as numbered above (37 C.F.R. § 1.51(a)(2)(i)(C)):

1. 2817 Fulmer Road, Lorain, Ohio 44053 *OH*

2. _____

3. _____

4. The title of the invention is (37 C.F.R. § 1.51(a)(2)(i)(D)):

PROCESS FOR THE MANUFACTURE OF RADIO FREQUENCY IDENTIFICATION CARDS

5. The name, registration, and telephone number of the attorney (if applicable) is (37 C.F.R. § 1.51(a)(2)(i)(E)):

Name of attorney: Steven M. Hana

Reg. No. 37,841 Tel. (216) 864-3330

(complete the following, if applicable)

☐ A power of attorney accompanies this cover sheet.

6. The docket number used to identify this application is (37 C.F.R. § 1.51(a)(2)(i)(F)):

Docket No.: 6014-GEN

7. The correspondence address for this application is (37 C.F.R. § 1.51(a)(2)(i)(G)):

1225 West Market Street

Akron, Ohio 44313-7188

8. Statement as to whether invention was made by an agency of the U.S. Government or under contract with an agency of the U.S. Government.
(37 C.F.R. § 1.51(a)(2)(i)(H)).

This invention was made by an agency of the United States Government or under contract with an agency of the United States Government.

☒ No.

☐ Yes.

The name of the U.S. Government agency and the Government contract number are:

9. Identification of documents accompanying this cover sheet:

A. Documents required by 37 C.F.R. §§ (a)(2)(i)-(ii):

Specification: No. of pages 13
 Drawings: No. of sheets 6

B. Additional documents:

☐ Claims: No. of claims 0

Note: A complete provisional application does not require claims. 37 C.F.R. § 1.51(a)(2).

- ☐ Power of attorney
☒ Small entity statement
☐ Assignment
☐ Other

NOTE: Provisional applications may be filed in a language other than English as set forth in existing § 1.52(d). However, an English language translation is necessary for security screening purposes. Therefore, the PTO will require the English language translation and payment of the fee mandated in § 1.52(c) in the provisional application. Failure to timely submit the translation in response to a PTO requirement will result in the abandonment of the provisional application. If a 35 U.S.C. 111(a) application is filed without providing the English language translation in the provisional application, the English language translation will be required to be supplied in every 34 U.S.C. 111(a) application claiming priority of the non-English language provisional application. Notice of April 14, 1995, 60 Fed. Reg. 20,195, at 20,208.

10. Fee

The filing fee for this provisional application, as set in 37 C.F.R. § 1.16(k), is \$150.00, for other than a small entity, and \$75.00 for a small entity.

☒ Applicant is a small entity.

NOTE: "A verified statement in compliance with existing § 1.27 is required to be filed in each provisional application in which it is desired to pay reduced fees." Notice of April 14, 1995, 60 Fed. Reg. 20,195, at 20,197.

11. Small entity statement

☒ The verified statement(s) that this is a filing by a small entity under 37 C.F.R. §§ 1.9 and 1.27 is(are) attached.

12. Fee payment being made at this time

- ☐ Not enclosed
☐ No filing fee is to be paid at this time
 (This and the surcharge required by 37 C.F.R. § 1.16(f) can be paid subsequently).

☒ Enclosed

Total fee enclosed \$ 75.00

13. Method of fee payment

☒ Check in the amount of \$ 75.00

☐ Charge Account No. _____
In the amount of \$ _____

A duplicate of this Cover Sheet is attached.

Please charge Account No. 15-0450 for any fee deficiency.

Date: 10/17/95

Tel.: (216) 864-5550

Signature of submitter

OR
Steven M. Haas
Signature of attorney

Date: 10/17/95

Reg. No.: 37,841

Tel.: (216) 864-5550

Steven M. Haas

(type or print name of attorney)

1225 West Market Street

P.O. Address

Akron, Ohio 44313-7188



607005685

STRACT

This invention is a Hot Lamination Method used to make/manufacture a unique plastic Radio Frequency Identification (RF/ID) card .028"-.032" thick with a smooth glossy surface flatness of .0005", capable to receive dye sublimation printing on both sides, to meet the International Standards Organization (ISO) format having a contactless read/write silicone computer chip and a wire or circuit board antenna capsulized for the purpose of identifying the individual user and to stop crime due to fraud and counterfeiting. Polyvinyl chloride, or other plastic substrates, is used in this Hot Lamination Method.



SUMMARY OF THE INVENTION

The main object of the invention of a Hot Lamination Method of making plastic cards is to meet the plastic card industry's need/demand for a method to make/manufacture a unique Radio Frequency Identification (RF/ID) card .028"-.032" thick, with a smooth glossy flatness of .0005" to receive dye sublimation printing on both sides of the card encapsulizing a contactless read/write silicone computer chip and a wire or circuit board antenna for identification and security of its user and to stop counterfeiting and crime. The Hot Lamination Method will meet the plastic card industry's need/demand. It also meets the standards of the International Standards Organization (ISO).

Another object of this invention is to enable transactions to be made using all of the electronic equipment already implemented throughout the world, such as automatic teller machines (ATM), electronic point of sale machines (POS), electronic telephone systems and unlocking the internet banking computer systems. Also to unlock and lock all kinds of doors (including personal and government security doors) and to lock and unlock all kinds of ignitions of vehicles and electronic equipment.

Another object of this invention is that it will be used in many ways such as financial transactions, telephone cards, passports, student identification, bus passes, airline tickets, drivers license, government security passes, prisoner identification, etc.

DESCRIPTION OF INVENTION

This invention is a Hot Laminating Method used to make/manufacture a unique plastic Radio Frequency Identification (RF/ID) card .028"-.032" thick with a smooth glossy surface flatness of .0005" having a contactless read/write silicone computer chip and a wire or circuit board antenna capsulized for the purpose of identifying the individual user and to stop fraud and counterfeiting.

The card is made of poly vinyl chloride, or other plastic substrates, and can receive dye sublimation printing. Dye sublimation printing is a method of printing on the surface of individual plastic cards (one card at a time) using a computer printer and a video camera.

The Hot Lamination Method is used to make a proximity card or plastic RF/ID card.

This invention is not the capsulized electronics (silicone computer chips and wires or circuit board antennas) but is the Hot Lamination Method of capsulizing the electronics in a thin (.028"-.032" thick) smooth glossy (.0005" surface flatness) plastic card that meets the International Standards Organization format.

The contactless read/write silicone computer and antenna, referred to as the electronics capsulized in the card, can receive a radio message that can change information inside the computer silicone chip and antenna, then rebroadcast that information back to the computerized transmitter. These electronics are called RFID, or Radio Frequency Identification Device. RFID technology is not new, but my Hot Lamination Method of making a thin smooth plastic card capsulizing the RFID is new.

PURPOSE OF THE INVENTION

The main purpose of this invention is to meet the plastic card industry's need/demand for a method of making a plastic card that will have the following characteristics and capabilities:

1. A thickness of .028"-.032" which is needed to fit all the electronic equipment already implemented throughout the world, such as Automatic Teller Machines (ATM), Point of Sale Machines (POS), electric telephone systems and the internet banking computer systems.
2. Has a smooth glossy surface flatness of .0005" capable of receiving dye sublimation printing on both sides of the card.
3. Has capsulized a read/write silicone computer chip and a wire or circuit board antenna, Radio Frequency Identification (RF/ID), giving it the capability to give proper identification and security to its user for transactions using passports, student identification, drivers license, airline tickets, bus passes, government security passes etc.
4. Has the capability, because of the capsulized RF/ID, to stop the crime of counterfeiting and fraud, thus saving the banking industry and taxpayers billions of dollars annually.
5. Has the necessary approval of the International Standards Organization.

BACKGROUND OF INVENTION

Field of the invention

A Radio Frequency Identification Device (RF/ID) is not a new technology, but my unique Hot Lamination method of making a thin (.028"-.032" thick) smooth glossy (.0005" surface flatness) plastic card encapsulating the Radio Frequency Identification Device is new technology.

Researchers in the plastic card industry have been trying for many years to devise a method to stop the fraud and counterfeiting which has amounted to the loss of billions of dollars annually to the banking industry and eventually to the taxpayers. They could not produce a plastic card that encapsulated both a silicone computer chip and a wire or circuit board antenna thin (.028"-.032" thick) and smooth enough (.0005" surface flatness) to meet International Standards Organization (ISO) format and to receive dye sublimation printing.

Among the plastic card manufacturers that worked to develop this card and failed are Colastics in Daily, California and Casi-Rusco in Boca Raton, Florida. For several years silicone computer chip manufacturers, such as Hughes in Tustin, California and Mikron (now a Division of Philips) in Gratakorn, Austria have been looking for a plastic card manufacturer to encapsulate their silicone computer chips and antennas into a plastic card at least .032" thick and a flatness of .0005" which is the standard for ISO to receive dye sublimation printing.

After twenty years of research and development, I found that the method to stop fraud and counterfeiting has evolved through electronics and radio frequencies. By applying the new electronics and radio frequencies, I invented a unique Hot Lamination Method of encapsulating the electronics into a plastic card .028"-.032" thick, with a smooth glossy flatness of .0005", to receive dye sublimation printing. Dye sublimation printing is a method of

BACKGROUND OF INVENTION (Continued)

printing on the surface of individual plastic cards, using a computer printer and a video camera. The computer and video camera is not part of my invention. Because my Hot Lamination Method can produce a card thin enough and smooth enough to receive dye sublimation printing and encapsulate RF/ID's, the manufacture of plastic RF/ID cards can soon begin.

Leading plastic card magazines and publications, such as the following, advertised in the July/August 1995 issues the need/demand of the plastic card industries for the .028"-.032" thick and .0005" surface flatness plastic RF/ID card to receive dye sublimation printing:

- * PIN PERSONAL IDENTIFICATION NEWS
- * CARD MANUFACTURING (The Official Publications of the International Card Manufacturing Associations)
- * WORLD CARD TECHNOLOGY MAGAZINE (The Magazine for Advanced Card Technology and Applications)
- * CARD WORLD INDEPENDENT (International Journal for the Plastic Card, Financial and Retail Industries)

DESCRIPTION OF PRIOR ART

United States Patent No. 5,412,192

Dated: May 2, 1995

Title: Radio Frequency Activated Charge Card

Inventor: Robert J. Haas

Abstract: Radio frequency activated charge card
a system for changing the activation status of a selected data card such as a charge card by broadcasting an appropriate RF signal. An antenna embedded in the card detects and decodes the signal, and operates a transducer which changes the card appearance, alters magnetic stripe information, or alters the information contained within the card.

The above prior art is very different from my invention of a Hot Laminated Method to make a unique plastic identification card which is .028"-.032" thick, with a smooth glossy surface flatness of .0005" having a Contactless read/write silicone computer chip and a wire or circuit board antenna capsulized for the main purpose of identifying the individual user and to stop counterfeiting and fraud.

The differences in the above prior art from my invention:

1. It is too thick and does not meet the International Standards Organization format for a thickness of .028"-.032". My card is .028"-.032" thick and meets the ISO format.
2. It has a heat sensing device that will blow a fuse at a certain temperature and, therefore, would not stand the heat of a laminator. My card withstands the heat of the laminator up to 370 F.
3. It has a battery implanted in it that would not stand the heat or pressure of the laminator. My card does not need a battery.

DESCRIPTION OF THE PRIOR ART (Continued)

4. It has a photocell which cannot withstand the heat or pressures of the laminator. My card does not need a photocell.
5. It has a liquid crystal display that would be destroyed by the heat and pressure of the laminator. My card does not need a liquid crystal display.
6. It is manufactured by a cold lamination process which does not give a smooth enough surface to receive dye sublimation printing and, therefore, would not fit in the computer printers. My card is made with a unique Hot Lamination Method which gives a smooth glossy surface of .0005" and will fit into computer printers.
7. It cannot pass the International Standards Organization stress test for flexing and bending without destroying the internal electronics, which are battery, fuses, crystal display and photocell. My card passes the ISO stress test for flexing and bending without destroying the internal electronics which are the wire coil antenna and micro chip.
8. It cannot be competitive in the manufacturing price range because it has too many electronics for a charge card. My card can be competitive in the manufacturing price range.

DESCRIPTION OF PRIOR ART

United States Patent No. 5,268,699

Dated: December 7, 1993

Title: Data Communication Receiver Utilizing a Loop
Antenna Having a Hinged Connection

Inventor: Peter K. Laute and T. Eaton

Abstract: A substantially card shaped data communication receiver (100) for receiving radio frequency (RF) signals comprises receiver circuitry for recovering information included in the RF signals, an insulative frame (210), a first conductive panel (215) disposed over a first side of the frame (210), and a second conductive panel (220) disposed over a second side of the frame (210) such that the receiver circuitry is enclosed within the space defined by the frame (210) and the first and second panels (215,220). The first and second panels (215,220) have coupling members formed thereon for electrically coupling the first panel (215) to the second (220). The data communication receiver (100) further comprises a first conductor (510) for electrically coupling the first panel (215) and the receiver circuitry and a second conductor (505) for electrically coupling the second panel (220) to the receiver circuitry such that the first and second panels (215,220) function as an RF antenna when disposed over the first and second sides, respectively, of the frame (210).

The above prior art is very different from my invention of a Hot Laminated Method to make a unique plastic identification card which is .028"-.032" thick, with a smooth glossy surface flatness of .0005" capable of receiving dye sublimation printing on both sides, having a contactless read/write silicone computer chip and a wire or circuit board antenna encapsulated for the main purpose of identifying the individual user and to stop counterfeiting and fraud.

DESCRIPTION OF PRIOR ART

United States Patent No. 5,268,699 (Continued)

The differences in the above prior art from my invention:

1. The above prior art is made of plastic and metal which is held together with screws. My card is made with four sheets of plastic only, molded together by my Hot Lamination Method capsulizing a Radio Frequency Identification Device (RFID).
2. The above prior art is not used for financial transactions. It is not a credit card or financial card. My Hot Lamination Method can produce a plastic RF identification card that can be used for financial transactions because it meets the International Standards Organization format and fits into the Automatic Tell Machines (ATM) and Point of Sale Machines (POS).
3. The above prior art is not tamper proof because it can be disassembled for repair. It is not a financial credit card; it is a communication receiver shaped like an identification card to receive radio frequency messages. My invention produces a plastic identification card that can be used to stop counterfeiting and fraud because of its tamper proof construction; it cannot be disassembled.

DESCRIPTION OF THE DRAWINGS

FIGURE 1, 2 and 3 are representative of RF/ID assemblies to be embodied in a plastic card by a Hot Lamination Method.

FIGURE 1 shows a wire coil antenna (1) and a micro chip (2).

FIGURE 2 shows a circuit board antenna (3) and chip (2).

FIGURE 3 shows a wire coil (1) and a read/write chip (4).

FIGURE 4 shows a wire coil (1) and a chip (2) placed on a plastic core sheet (5) overlaid with another plastic core sheet (5), as shown in the SIDE VIEW of FIGURE 5.

FIGURE 5 is the SIDE VIEW showing the embodiment of the RF/ID assembly layered between sheets (5).

FIGURE 6 is an END VIEW showing the same layering as FIGURE 5.

FIGURE 6 is an illustration of an assembly ready to be placed into the laminator, as illustrated in FIGURE 10.

FIGURE 7 shows wire core antennas (1) and chips (2) placed on a plastic sheet (5).

FIGURE 8 shows a wire coil antenna (1) and a micro chip (2) placed between two plastic core sheets (5). The two plastic core sheets have a thickness of .0125" each.

FIGURE 9 is an END VIEW showing the same layering as FIGURE 8.

FIGURE 10 shows the core sheets (5) and RF/ID's (1) and (2) placed within the laminator, as illustrated in FIGURE 8.

FIGURE 11 shows either a printing press or silk screen press (11) applying printing ink (6) on surface of plastic sheet (5).

FIGURE 12 shows a layer of clear plastic overlamine film (7) placed on the printing surface (6).

DESCRIPTION OF THE DRAWINGS (Continued)

FIGURE 13 shows a laminator containing FIGURE 12 ready to go through the laminating cycle - as follows:

The first laminating process in building up the core sheets (5) begins with the two core sheets (5) containing the RFID's (1) and (2) being placed into the laminator on a matte finished laminating plate (8). The laminating plate (8) is placed on a laminating pad (9). The laminating pad (9) is placed on a steel plate or tray (10). This layering is the same on the top and bottom, making up a book to be inserted into the laminator as illustrated in FIGURE 10. The laminator begins its first heat cycle by merely closing the laminator without applying any pressure to the core sheets (5). The heat is then applied and brought up to a temperature between 300 F - 370 F for a period of 7 - 10 minutes. After this first cycle, the ram pressure is increased according to the sheet size to permit the flow of the plastic core sheets (5) to encapsulate the RFID's (1) and (2). This cycle will continue for approximately 10 - 15 minutes. The laminating pressure is determined by the sheet size used and the number of coils placed upon the surface of the sheets. After the heat cycle is complete it starts into a chill cycle. The ram pressure of the laminator is increased by 25% until the embodiment is cooled down approximately 45 F - 60 F for approximately 12 - 15 minutes under the ram pressure. After ram pressure has been lowered or the laminator opened, this completes the cycle of the laminating process to manufacture the core sheets (5) containing the RFID's (1) and (2) embodied into one core sheet (5) with the thickness approximately .025"-.026". The core sheets are removed from the matte finish laminating plates, the sheets are then ready with a matte finish prepared for a printing application FIGURE 11. This printing application will cover any exposed wire or micro chips that have discolored or flowed through the plastic.

DESCRIPTION OF THE DRAWINGS (Continued)

FIGURE 13 (continued)

After printing, the lamination process is followed up by placing a steel plate on the platen of the laminator (12) and then the laminating pad (9). Then place a mirror-finish stainless steel laminating plate (13) is placed on the laminating pad (10). The RFID assembly embedded in the plastic core sheets (5) with printing area (6) are placed on overlamine film (7) with a thickness of .0015". Then a laminating mirror-finish stainless plate (13) is placed on the overlamine film (7) and covered with a laminating pad (9) and then covered with a steel plate (10) and is then placed inside of the laminator. The laminator is then closed to a normal laminating plastic lamination at a heat range of 180F- 212 F for approximately 15 - 20 minutes and then the laminator is brought to the cooling cycle with a 25% in ram pressure with a chill cycle of 45 F - 60 F for a period of 12 - 15 minutes. This will complete the laminating cycle. The sheets can be removed from the mirror-finish plate (13). The cards can be cut from the sheets giving individual plastic cards containing RFID's for identification cards or credit cards.



Attorney's Docket No. 6014-GEN

PATENT

Applicant or Patentee: Leighton, Keith R.

Application or Patent No. /

Filed or Issued:

For: PROCESS FOR THE MANUFACTURE OF RADIO FREQUENCY IDENTIFICATION CARDS

**VERIFIED STATEMENT (DECLARATION) CLAIMING SMALL ENTITY
STATUS (37 CFR 1.9(f) and 1.27(b))—INDEPENDENT INVENTOR**

As a below named inventor, I hereby declare that I qualify as an independent inventor, as defined in 37 CFR 1.9(c), for purposes of paying reduced fees under Sections 41(a) and (b) of Title 35, United States Code, to the Patent and Trademark Office with regard to the invention entitled PROCESS FOR THE MANUFACTURE OF RADIO FREQUENCY IDENTIFICATION CARDS described in

☒ the specification filed herewith.

☐ application no. / , filed

☐ patent no. , issued

I have not assigned, granted, conveyed or licensed, and am under no obligation under contract or law to assign, grant, convey or license, any rights in the invention to any person who could not be classified as an independent inventor under 37 CFR 1.9(c), if that person had made the invention, or to any concern that would not qualify as a small business concern under 37 CFR 1.9(d), or a nonprofit organization under 37 CFR 1.9(e).

Each person, concern or organization to which I have assigned, granted, conveyed, or licensed or am under an obligation under contract or law to assign, grant, convey, or license any rights in the invention is listed below:

☒ no such person, concern, or organization.

☐ persons, concerns or organizations listed below *

*NOTE: Separate verified statements are required from each named person, concern or organization having rights to the invention averring to their status as small entities. (37 CFR 1.27)

FULL NAME

ADDRESS

☐ INDIVIDUAL ☐ SMALL BUSINESS CONCERN ☐ NONPROFIT ORGANIZATION

FULL NAME

ADDRESS

☐ INDIVIDUAL ☐ SMALL BUSINESS CONCERN ☐ NONPROFIT ORGANIZATION

FULL NAME

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☐ INDIVIDUAL ☐ SMALL BUSINESS CONCERN ☐ NONPROFIT ORGANIZATION

I acknowledge the duty to file, in this application or patent, notification of any change in status resulting in loss of entitlement to small entity status prior to paying, or at the time of paying, the earliest of the issue fee or any maintenance fee due after the date on which status as a small entity is no longer appropriate. (37 CFR 1.28(b))

I hereby declare that all statements made herein of my own knowledge are true and that all statements made on information and belief are believed to be true; and further, that these statements were made with the knowledge that willful false statements and the like so made are punishable by fine or imprisonment, or both, under Section 1001 of Title 18 of the United States Code, and that such willful false statements may jeopardize the validity of the application, any patent issuing thereon, or any patent to which this verified statement is directed.

Keith R. Leighton

Name of Inventor

Keith R. Leighton

X Date 10-16-95

X Signature of Inventor

Name of Inventor

Date

Signature of Inventor

Name of Inventor

Date

Signature of Inventor

005685

FIG. 1

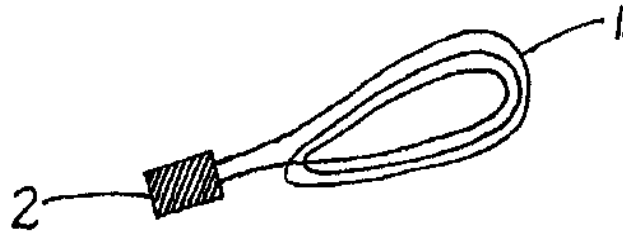


FIG. 2

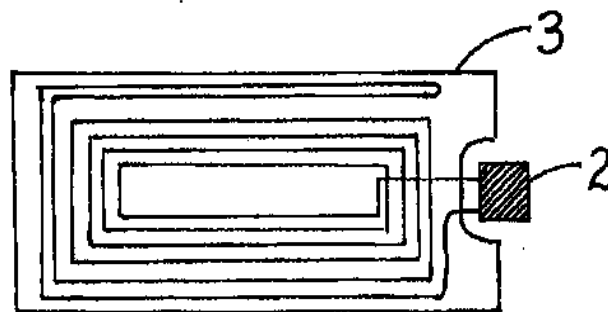
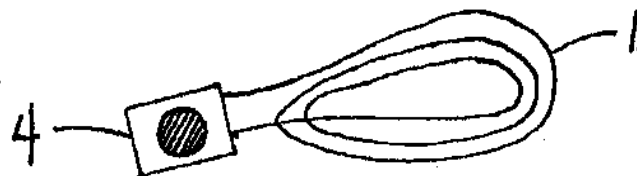


FIG. 3



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FIG. 4

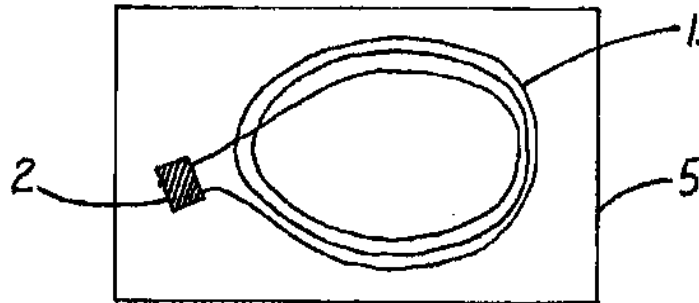


FIG. 5

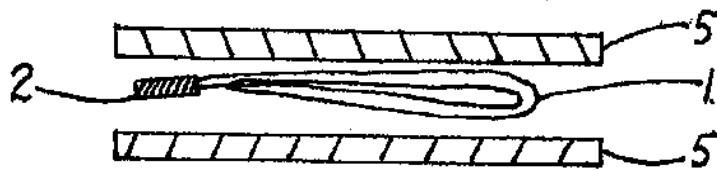
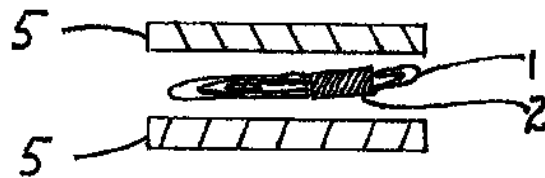


FIG. 6



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FIG. 7

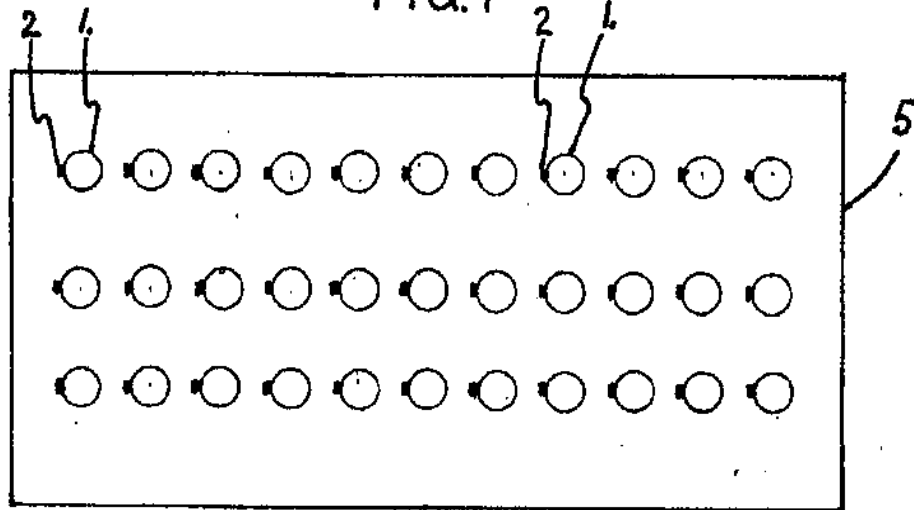


FIG. 8

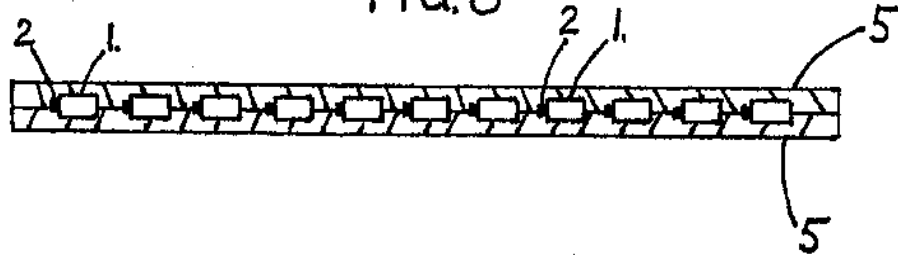
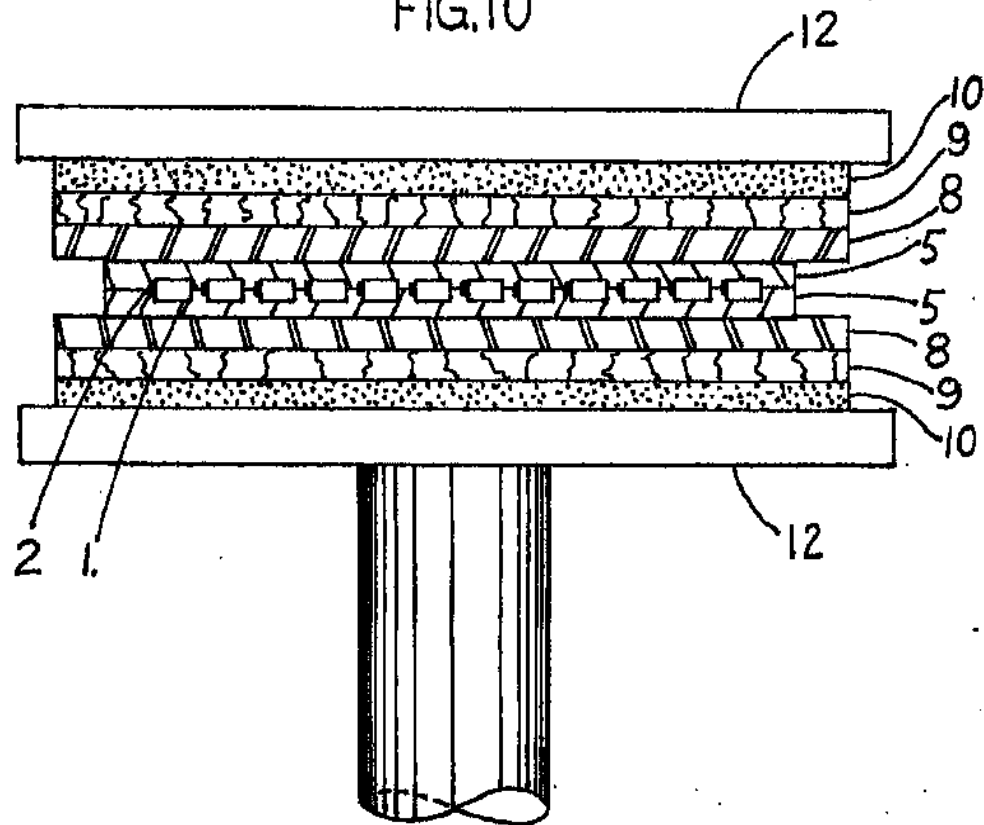


FIG. 9



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FIG.10



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FIG. 11

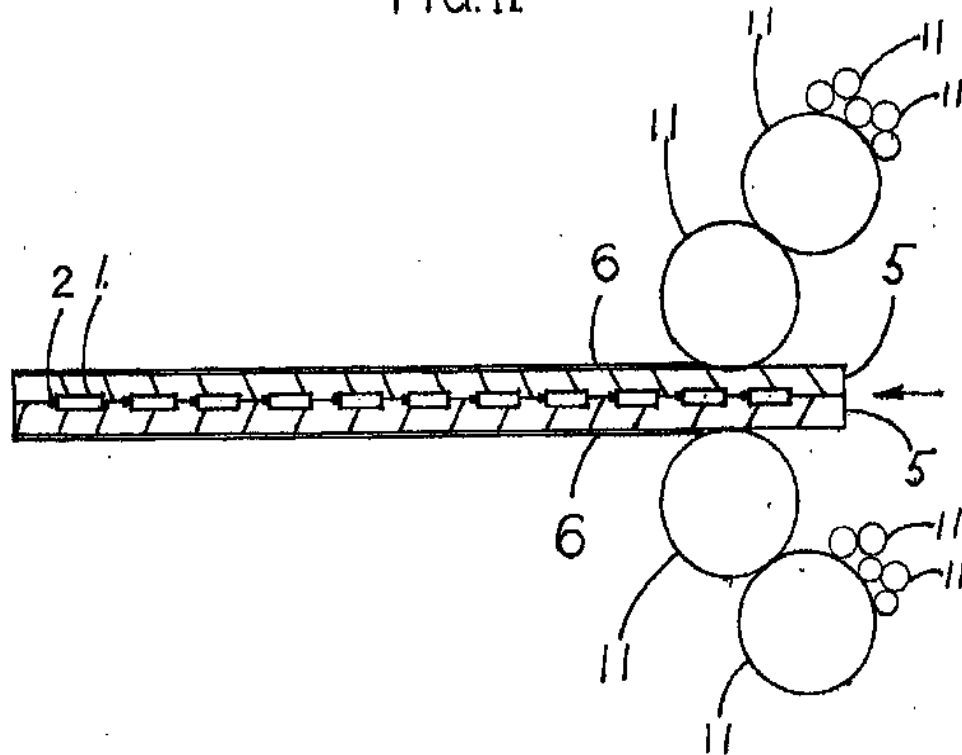
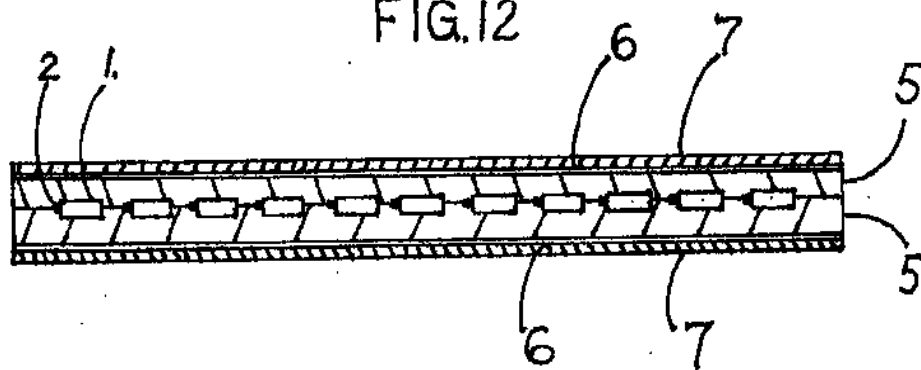
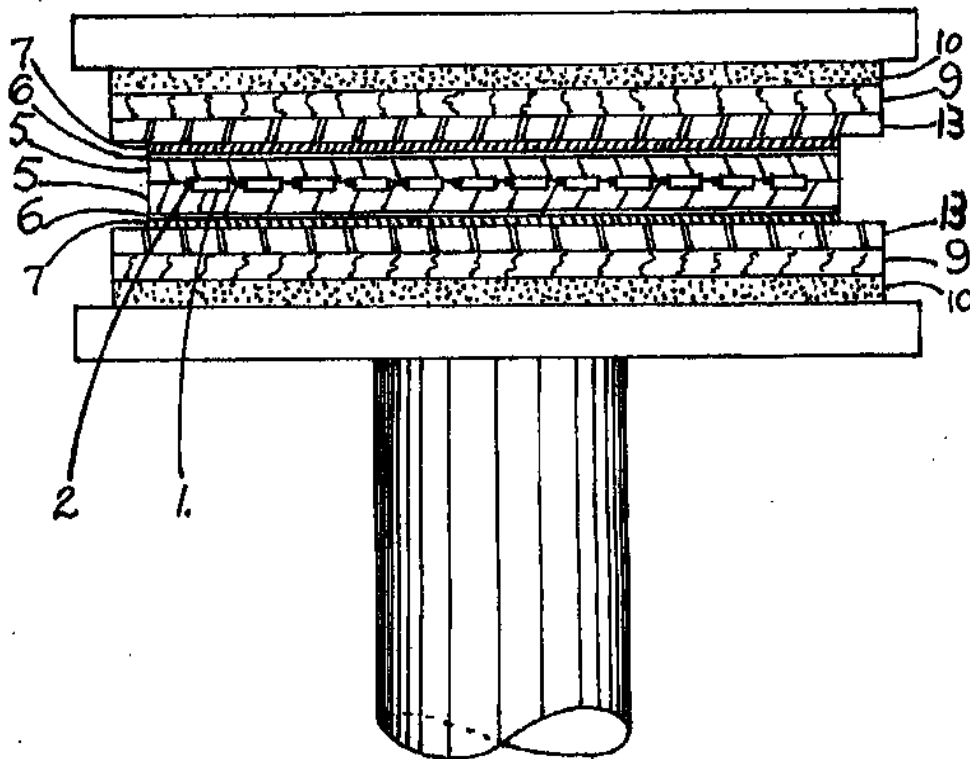


FIG. 12



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FIG. 13



Burden Hour Statement: This form is estimated to take 0.2 hours to complete. Time will vary depending upon the needs of the individual case. Any comments on the amount of time you are required to complete this form should be sent to the Chief Information Officer, U.S. Patent and Trademark Office, Washington, DC 20231. DO NOT SEND FEES OR COMPLETED FORMS TO THIS ADDRESS. SEND TO: Assistant Commissioner for Patents, Washington, DC 20231.

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(Rev. 2-84)

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PCT/FOREIGN APPLICATION DATA

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FILING DATE

MONTH DAY YEAR

EXHIBIT 63

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

- - - - -
LEIGHTON TECHNOLOGIES, LLC,)

plaintiff,)

vs.) Case No.

) 04 Civ. 02496 (CM)

OBERTHUR CARD SYSTEMS, S.A.)

and OBERTHUR CARD SYSTEMS)

OF AMERICA CORP.,)

defendants.)

- - - - -
(Volume III - pages 522 through 875)
- - - - -

Continued videotaped deposition of
KEITH LEIGHTON, a witness herein, called by the
defendants as if upon cross-examination, and
taken before David J. Collier, RPR, Notary
Public within and for the State of Ohio,
pursuant to Notice of Deposition and pursuant to
the further stipulations of counsel herein
contained, on Monday, the 23rd day of October,
2006 at 8:02 a.m., at the offices of Tackla &
Associates, 1020 Ohio Savings Plaza, City of
Cleveland, County of Cuyahoga and the State of
Ohio.

Tackla & Associates

ded6f7f6-daef-4705-a501-e03c1d19420

1 A No. No.

2 Q Did they have any presses?

3 A Printing presses, that's strictly it.

4 Q That's not a laminating press?

5 A No.

6 Q Did you -- did you have a -- you didn't
7 have a laminating press at home, did you?

8 A No.

9 Q Okay. Did you have access to a lamination
10 press from May 5th of '95, when you stopped
11 working for Motorola, to when the -- your
12 provisional patent application was filed?

13 A No, I wasn't doing any card work at all.

14 Q You weren't doing any experiments or tests?

15 A No, until I went to -- back to 2B System to
16 make the Mifare and Hitag cards.

17 Q But that was after October of '95, right?

18 A Yes.

19 Q That was in -- sometime in '96.

20 A Correct.

21 Q Okay. So it's fair to say that after you
22 left Motorola and continuing over the next
23 couple of months to think about the problems and
24 issues that arose, you came up with the idea
25 that led to your patents?

1 A Yes.

2 Q And that --

3 A That's correct.

4 Q And that was for a process and a method for
5 making a laminated card with an embedded
6 electronic element --

7 A Correct.

8 Q -- that wouldn't be damaged during the
9 lamination process.

10 A Correct.

11 Q Thin enough to meet ISO standards.

12 A Yes.

13 Q Okay. And how did you come up with the
14 temperatures and pressures that would be used
15 during that process?

16 A After I left Motorola, there's a company
17 out in Newcomerstown, Ohio that had PVC extended
18 life plastic, it was a homopolymer and
19 copolymer. By using that type of PVC, I could
20 come up to higher temperatures without yellowing
21 the plastic, and I was able to go to
22 temperatures that I couldn't go at Motorola, and
23 I made some tests there at CSI to make this
24 card.

25 Let me back up here. I made some

1 tests there of lamination. At the same time I
2 received some electronics from Micron, both
3 Mifare and Hitag. I manufactured both Hitag and
4 Mifare on the same sheets, same core sheets.

5 Q Okay. But -- but everything you're talking
6 about occurred after the beginning of '96,
7 right?

8 A Correct.

9 Q Okay.

10 A The first part of '96 --

11 Q Okay.

12 A -- I was out there.

13 Q Yeah. I want to -- I want to talk about as
14 of the time you filed your provisional patent
15 application.

16 A Um-hum.

17 Q What did you have in mind in terms of
18 temperatures and pressures at which the
19 operation -- process would occur? Did you have
20 any temperatures or pressures in mind?

21 A I knew I had to flow the plastic. I didn't
22 know the temperatures that I would be going to
23 because I didn't have the plastic core sheets
24 set yet.

25 Q Okay. How about the pressures, did you

EXHIBIT 64

October 22, 1999

TO: Matt Winter
Director of Manufacturing
Motorola's Worldwide Smartcard Solutions Division

FROM: Keith Leighton
President
Leighton's Smart Cards and Systems, Inc.

SUBJECT: PHONE CONVERSATION OCTOBER 20, 1999 REGARDING
PATENTS ON SMART CARD TECHNOLOGY

Dear Matt:

Thank you for your interest in my smart card technology and your request for more information about my patents.

CONTACTLESS RFID CARD AND HOT LAMINATION PROCESS FOR
THE MANUFACTURE OF RADIO FREQUENCY IDENTIFICATION CARDS

I am faxing you today the abstract on this patent, number 5,817,207. This patent was issued 10-17-98. My Provisional Patent Application is dated 10-17-95. I would like a license agreement with Motorola to manufacture this card in U.S.

HOT LAMINATION METHOD TO MANUFACTURE THE COMBINATION
CONTACT/CONTACTLESS SMART CARD MEETING ISO STANDARDS
AND CAPABLE OF RECEIVING DYE SUBLIMATION PRINTING

This patent has been allowed by the U.S. Patent Office and is a continuation of patent number 5,817,207. It is for sale.

ULTRA-THIN FLEXIBLE DURABLE RADIO FREQUENCY IDENTIFICATION
DEVICE AND HOT LAMINATION PROCESS FOR THE MANUFACTURE OF
ULTRA-THIN FLEXIBLE DURABLE RADIO FREQUENCY IDENTIFICATION
DEVICE

I have a patent pending for the manufacture of this device, and I have successfully made a beautiful prototype. This RFID is very thin and can be made in many shapes and sizes and has a superior outer surface (matte or glossy) so that it may receive all types of printing. I am ready to give a license agreement to manufacture this RFID.

OTHER PATENTS PENDING

I have other patents pending. I am reluctant to discuss them at this time.

Page 2 October 22, 1999

TO: Matt Winter

FROM: Keith Leighton

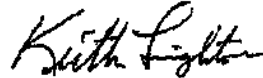
September's CARD TECHNOLOGY magazine is very informative, especially the great story "Transit Smart Cards Are Ready To Roll" about the ERG-Motorola alliance and their success. I am very impressed.

Very soon the North American smart card boom will hit. Therefore, I am anxious to give license agreements to card manufacturers so that they may use my patented contactless and contact/contactless smart card technology. My contact/contactless smart card patent is for sale; however, I will consider a license agreement to manufacturers. I expect to be justly compensated by those using my patented technology. A lot of time, effort and money was invested in these patents.

If you would like more information regarding the above, you may contact my patent attorney, Mark Watkins, who is with OLDHAM & OLDHAM CO., L.P.A. His phone number is 330-864-5550. Also, a bilateral NDA should be signed.

I look forward to hearing from you.

Cordially,



Keith Leighton
Phone: 440-960-1697
Fax: 440-960-0013

KL:1

EXHIBIT 65



January 8, 2002

Mr. Keith R. Leighton
Printing Technical Consultant
2817 Fulmer Road
Lorain, OH 44053

Re: Licensing Opportunity
US Patent No.: 6,036,099

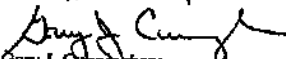
Dear Mr. Leighton:

A copy of your patent and business card received by Motorola has been forwarded to me for processing.

Upon review of your patent, Motorola respectfully declines to pursue any licensing discussions at this time as it has exited the business.

Thank you for thinking of Motorola in connection with this opportunity.

Sincerely,


Gary J. Cunningham
Senior Counsel
Motorola, Inc.

Law Department
1301 East Algonquin Road, Schaumburg, Illinois 60196
Tel: (847) 576-1974 Fax: (847) 576-0721

Trial Counsel's Eyes Only

L06501

EXHIBIT 66

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

- - - - -
LEIGHTON TECHNOLOGIES, LLC,)
) plaintiff,)
vs.) Case No.
) 04 Civ. 02496 (CM)
OBERTHUR CARD SYSTEMS, S.A.)
and OBERTHUR CARD SYSTEMS)
OF AMERICA CORP.,)
) defendants.)

- - - - -
(Volume III - pages 522 through 875)
- - - - -

Continued videotaped deposition of
KEITH LEIGHTON, a witness herein, called by the
defendants as if upon cross-examination, and
taken before David J. Collier, RPR, Notary
Public within and for the State of Ohio,
pursuant to Notice of Deposition and pursuant to
the further stipulations of counsel herein
contained, on Monday, the 23rd day of October,
2006 at 8:02 a.m., at the offices of Tackla &
Associates, 1020 Ohio Savings Plaza, City of
Cleveland, County of Cuyahoga and the State of
Ohio.

Tackla & Associates

ded6f7f6-daef-4705-a501-eb03c1d19420

1 A Yes. Um-hum.

2 Q That was back in the 1999 time frame --
3 1995 time frame?

4 A Yes.

5 Q Now, correct me if I'm wrong, just to get a
6 little background, in 1995 you had done some
7 consulting work for Motorola; is that correct?

8 A That's correct.

9 Q You were never an employee at Motorola?

10 A No, strictly on a consulting basis.

11 Q You signed a contract with Motorola on a
12 consulting basis?

13 A Yes, I did.

14 Q And you understand that as a -- pursuant to
15 that consulting contract Motorola paid you some
16 money for you to provide some consulting
17 information to them; is that true?

18 A That's correct.

19 Q And the consulting that you provided to
20 Motorola in 1995 was in the contactless card
21 area; is that fair?

22 A Yes. They had a proximity card that they
23 wanted to use for identifi -- identifying an
24 employee.

25 Q Okay. Was the proximity card a card

EXHIBIT 67

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

LEIGHTON TECHNOLOGIES, LLC,)
) plaintiff,)
vs.) Case No.
) 04 Civ. 02496 (CM)
OBERTHUR CARD SYSTEMS, S.A.)
and OBERTHUR CARD SYSTEMS)
OF AMERICA CORP.,)
) defendants.)

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Ohio.

Tackla & Associates

ded6f7f6-daef-4705-a501-e03c1d19420

1 A So on your hot side -- we tried to maintain
2 the temperature of the laminator on the hot
3 side. As soon as you put a book into it, the
4 book starts to absorb the heat from the platen
5 and it turns the electronic heating elements
6 back on again, so you have a fluctuation in
7 temperature.

8 Q Okay.

9 A So as soon as it goes in, you try to do
10 your process as fast as possible.

11 Q It's like -- it's like baking cookies, it
12 sounds like, right? You're supposed to preheat
13 the oven, right?

14 A That's correct.

15 Q You open the door, you slide the tray in,
16 you close it, you lose some heat, it's got to
17 get back up to where it was supposed to be.

18 A It's got to get back up.

19 Q Okay. But the goal and the process used at
20 Motorola for the dime-sized electronics was to
21 have the press at the heating phase temperature
22 from the get-go?

23 A Correct.

24 Q And that might drop a little bit when the
25 pre-lams absorbed some of the heat.

1 A Right.

2 Q But not a huge amount.

3 A Right.

4 Q And then you'd get back up to temperature.

5 A Right.

6 Q And you maintained that temperature
7 throughout the heating phase?

8 A We tried to, yes.

9 Q Okay. So there was no intended increase or
10 decrease during the heating phase?

11 A No.

12 Q And is that true also for the silver dollar
13 sized --

14 A Correct.

15 Q -- electronic elements you made?

16 A Correct.

17 Q No temperature change during the heating
18 phase?

19 A Correct.

20 Q And then once the heating phase was over,
21 was the switch flipped and the temperature
22 turned off immediately or was there --

23 A No.

24 Q What happened?

25 A The hot side stays hot all the time.

1 Q Okay.

2 A We tried to maintain that.

3 Q So you take the sheets out.

4 A You transfer, another set of books goes in
5 the hot side and the set of books that you have
6 on the hot side goes to the cold side.

7 Q Okay. Let's finish --

8 A And then you close the laminator again, you
9 have a new set on the hot side and you have a
10 set on the cold side, and you try to close at
11 the same time.

12 Q Got it. Okay.

13 Let's -- all right. Let's go back to
14 the -- let's finish with the hot side, okay?

15 You're up to temperature.

16 A Correct.

17 Q 330 degrees or so, you're ready to go, and
18 when -- for the dime-sized cards that you
19 laminated for Motorola, was the pressure applied
20 immediately when the platens were closed?

21 A As soon as the cassette of cards comes into
22 the hot side and they're in place, then you shut
23 the laminator --

24 Q Okay.

25 A -- activating the heat cycle. It has to be

1 shut to activate the heat. Once open, it's not
2 heating. When you close it, it's heating.

3 Q Okay. And how long would it take for the
4 pre-lams, in general terms, to feel the heat
5 once the platens closed? Was it immediate?

6 A You close the platens and then you have a
7 heat soak time so that you can equalize the heat
8 through the entire book.

9 Q How long would it take for the -- for the
10 inlays to feel any heat?

11 A Oh, 10 to 15 minutes.

12 Q Before they felt any heat or before they --

13 A No, before they equalized.

14 Q Okay.

15 A It's a heat soak, so you got the --

16 Q All right.

17 A -- top of the book --

18 Q Right.

19 A -- the same temperature as the bottom of
20 the book.

21 Q Okay. So --

22 A All the way through.

23 Q So they would feel heat pretty quickly and
24 it would take 15 minutes for it to equalize?

25 A Correct.

1 Q And how long were they heated totally?

2 A Your total heat cycle, I would say, would
3 be about 20 to 25 minutes on the heat side.

4 Q Is that after the heat soak time was
5 equalized?

6 A Right.

7 Q So 15 minutes to equalize and then another
8 20 to 25 --

9 A Correct.

10 Q -- to finish the heat process?

11 A Correct.

12 Q And that's the same for the dime size as
13 the silver sized --

14 A Right.

15 Q -- electronic element?

16 A I'm going to have to take a break here at
17 this time.

18 Q Oh, please. Yeah. Absolutely.

19 - - - - -

20 (Recess had.)

21 - - - - -

22 BY MR. DeFRANCO:

23 Q All right. We were talking about the
24 heating phase in the process you used at
25 Motorola, the first process you used; do you

1 remember that?

2 A Yes. I was wondering, can he read back
3 through where we left off at?

4 Q Let me -- let me just pick up.

5 A I have to get my chain of thought here.

6 Q Yeah, let me just pick up with it, okay?

7 A Okay.

8 Q We were talking about the heat soak time,
9 do you remember that, some period of time --

10 A Right.

11 Q -- that it takes?

12 A Right.

13 Q And you said 15 minutes or so.

14 A Right.

15 Q Okay. And then there is an additional time
16 once the temperature is equalized across all the
17 inlays of the heating cycle; is that right?

18 A Right. That's correct.

19 Q Okay. Do -- do the inlays -- in the
20 process you used at Motorola, would the inlays
21 see heat pretty immediately or would it take
22 some amount of time before they would feel any
23 heat?

24 A Well, to -- for the heat to go through the
25 book entirely from top and bottom, we had to

EXHIBIT 68

1 *****CONFIDENTIAL DEPOSITION*****
2 IN THE UNITED STATES DISTRICT COURT
3 SOUTHERN DISTRICT OF NEW YORK

4 Leighton Technologies, LLC,)
5 Plaintiff-Counterclaim)
6 Defendant,) Case No.
7 -vs-) 04Civ
8 Oberthur Card Systems, S.A.,) 2496 (CM)
9 Defendant-Counterclaim)
10 Plaintiff.)

11 - - - o0o - - -

12 Continued deposition of KEITH R.
13 LEIGHTON, a witness herein, called by the
14 Defendant- Counterclaim Plaintiff, as if
15 upon cross-examination under the statute,
16 and taken before Luanne Stone, a Notary
17 Public within and for the State of Ohio,
18 pursuant to the issuance of notice and
19 subpoena, and pursuant to the further
20 stipulations of counsel herein contained, on
21 Monday, the 10th day of October, 2005 at
22 9:00 o'clock A.M., at the Renaissance Hotel,
23 the City of Cleveland, the County of
24 Cuyahoga and the State of Ohio.

25 *****CONFIDENTIAL DEPOSITION*****

1 half of the sentences are in shorthand which
2 I can't read, half in writing, so --

3 Q: Do you recognize the document?

4 A: Yes. This is my wife's handwriting.
5 As to its full content, a lot of it I can't
6 read. I can't read shorthand.

7 Q: Do you know what the -- what the
8 purpose of this document is?

9 A: Oh, we -- we were writing
10 correspondence back to Ken Thompson, telling
11 him his responsibilities that they didn't
12 keep, along with the responsibilities that I
13 did keep, but I -- fulfillment of our
14 contract agreement that I was doing was
15 impossible because I could only do what I
16 have to work with.

17 Q: Did you ever, in fact, write a letter
18 to Mr. Thompson that included some or all
19 the points that are made in Exhibit 118?

20 A: I don't know whether some were
21 excluded or put in there additional. I
22 don't know for sure.

23 Q: Did -- did you write a response back
24 to Mr. --

25 A: Yes, we did.

TACKLA & ASSOCIATES

EXHIBIT 69

1 *****CONFIDENTIAL DEPOSITION*****

2 IN THE UNITED STATES DISTRICT COURT

3 SOUTHERN DISTRICT OF NEW YORK

4 Leighton Technologies, LLC,)

5 Plaintiff-Counterclaim)

6 Defendant,) Case No.

7 -vs-) 04Civ

8 Oberthur Card Systems, S.A.,) 2496 (CM)

9 Defendant-Counterclaim)

10 Plaintiff.)

11 - - - 000 - - -

12 Continued deposition of KEITH R.

13 LEIGHTON, a witness herein, called by the

14 Defendant- Counterclaim Plaintiff, as if

15 upon cross-examination under the statute,

16 and taken before Luanne Stone, a Notary

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19 subpoena, and pursuant to the further

20 stipulations of counsel herein contained, on

21 Monday, the 10th day of October, 2005 at

22 9:00 o'clock A.M., at the Renaissance Hotel,

23 the City of Cleveland, the County of

24 Cuyahoga and the State of Ohio.

25 *****CONFIDENTIAL DEPOSITION*****

Delmar

Answers Only!

1.) Materials

a.

The documented report is by the
 Shipper containing
 a Bill of Material (no charge)
 and a description of the materials
 (size, thickness and
 number of sheets)

There was a
 M. S. D. A. ~~report~~
 document supplied (containing
 upon arrival of the
 materials, if I personally
 handed to Ron Thompson)

b.

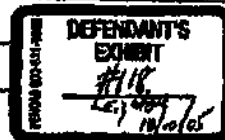
All shipping receipt
 I have to look at the material
 or it arrived to see if it
 was damaged and if I matched
 (Shipper).

c.

As applicable - it must
 stored in dry conditions
 and lie flat

d.

As indicated on Shipper



Trial Counsel's Eyes Only

L08632

2

2.

a.)

your figures are in error
 We produced a card .038
 to .042. Anything
 larger - I don't print.
 I had the more - a 25% yield
 (I) improved it to 50%
 Ken Thompson of C/ & S
 traps and laminated plates
 I match size, but Ken did
 not cooperate. That is no fault
 of mine

b.)

The 2 was attempted in heavy
 joint mark. I tested
 welding points of the steel
 gluing temperature. I
 achieved a thickness of
 desired.

c.)

Wrong. This I - done in
 my presence. I only
 (2) cassettes for test. I gave
 1/2) enough material to
~~do it. No fault of mine.~~
 I had 1 cassette bank. No
 fault of mine. Ken
 did not cooperate.

3

d.) Yes it is applicable!

a hand written log set (Ken Thaw and I) documented each load & formation process. Log book
 e.) Yes we were ^{outside} ~~inside~~ ~~there~~

~~inside~~ We measured each ~~outside~~ sheet and ~~it~~ tested coils as they came off the press and identified as sheet. This ~~was not~~ ~~done~~ ~~by~~ ~~Ken~~ ~~Thaw~~ failed to check ~~his~~ ~~own~~ ~~record~~ (the log book) and ask us if our ~~logs~~ ~~of~~ ~~mine~~.

B

as Ubray - it & agreed to ~~be~~ ~~by~~ ~~a~~ monetary system of ~~lamination~~ ~~(~~ Ken Thaw expected apply ~~comparable~~ ~~it~~ ~~now~~ ~~lamination~~ ~~to~~ ~~I~~ ~~requested~~ ~~to~~ ~~this~~ ~~I~~ ~~came~~ ~~from~~ ~~San~~ ~~Jose~~ ~~see~~ ~~my~~ ~~letter~~ ~~dated~~ ~~March~~ ~~20,~~ ~~1985,~~

4

b) Wrong - I ~~was~~ ~~was~~
 I recalled Herbert Proant
 One in my letter dated
 March 20, 1995, for
 static control. I ~~was~~
 did ~~not~~ order ~~it~~ ~~like~~ ~~a~~ ~~static~~
 not ~~only~~
 control ~~only~~ after I left
 Motorola. I did not
 it while I was there.
 Again, Ken Thompson
 did not cooperate with
 the consultant. Motorola has
~~not~~ ~~to~~ ~~advise~~

c) Wrong - ^{Ken Thompson} ~~Ken Thompson~~ did purchase
 laboratory plates (the size
 I requested) ~~and~~ they
 didn't arrive after I left
 Motorola. I didn't
 available for testing. No
 faults of mine. This was
 lack of ~~planning~~ ^{planning} (Ken Thompson
 N/A = because Ken Thompson failed
 to put the measures ^{on}
 (examinators no faults of
 mine.)

5.

It was done!

a)

~~Ultrasonic~~ = I used a pen
tester to check the coils -
each sheet I ~~is~~ used ~~in~~
L (laminar, ~~in~~ I use
range ~~of~~ 9 coils each sheet
on each test, ~~about~~ 0 holes
rule under

4

~~There~~ - It was gone!

While that hour was
present, Henry Becker & Hermann
Mannings & Buskley & I went
over the laminator &
at our point of lubrication
& followed. Henry & Mary
Becker & 7 laminator, separator
and ~~of~~ improvement & (of
I produce a good product,
the laminator, - I consider
a fail, as I previously
w. auto. by Henry Becker & I,
The laminator is corrected,
(& pumps & valves
and overhauling laminator
plates.

4 (a)

see

a.)

6

Ron & Chapman did something
~~after~~ after I left ^{urgently} because
 when I was at Malvern
 I had a ~~much~~ ^{much} higher yield
 (that's ~~it~~ ^{it}) ~~the~~ ^{the} higher
 energy. ~~It was~~ ^{It was} to be
 a successful product.
 I went to a couple
 of C.I. & material
 and tooling. ~~It was~~ ^{It was}
~~manufactured of mine~~ ^{manufactured of mine}
~~the~~ ^{the} ~~material~~ ^{material}.

b.)

Then I suppose became
 of lack of ~~the~~ material
 and tooling. I don't have
 a major road. Jean-Marc
~~remember~~ remember when
 I ~~had~~ ^{had} hand-make
 coils for me because
 there were none available.

supply me with the needed
materials, and totaling to
produce 10,000 cards in the
~~time~~ ~~the~~ allotted 4 weeks.
in which I am ^{sure} incapable of
~~it~~ ~~to~~. Therefore, it
was not my fault of mine,
that at 19,000 cards were
produced in 4 weeks!
I would say @ a \$1.50 per
dozen if I produce the
10,000 - 4 weeks.

[illegible]

I have reviewed the "Selmer'ski
list" and have answered all
issues in bold type print.
As a paper most of it was
~~not~~ completed as
far as I could get without
losing the people's model
and the material and being
needed.

On seeing ~~the original~~ ~~to find~~
~~the original~~ and I
~~was~~ ~~informed~~ ~~possible~~

After 2 days ~~much~~, ~~much~~
 I had a radio. ~~much~~ ~~much~~
 requested ~~much~~ ~~much~~ ~~much~~
 an electronic ~~much~~ ~~much~~ ~~much~~
 surface of ~~much~~ ~~much~~ ~~much~~
 of or dye sublimation printing.
 You congratulated ~~much~~ ~~much~~
 and is ~~much~~ ~~much~~ ~~much~~
 the ~~much~~ ~~much~~ ~~much~~

EXHIBIT 70

Keith Leighton
2817 Fulmer Rd.
Lorain, Ohio 44053

February 13, 1997

Grace O'Malley
MOTOROLA

Fax 847-576-2111

SUBJECT: UNIQUE HOT LAMINATION MANUFACTURING METHOD TO PRODUCE
PVC CARDS HAVING A THICKNESS OF .028"-.032" AND A
SMOOTH GLOSSY FINISH OF .0005" ON BOTH SIDES OF THE
CARD TO RECEIVE DYE SUBLIMATION PRINTING AND A FLUSH
MAG STRIPE - A RFID CONTACT/CONTACTLESS SMART CARD

Dear Grace:

Thank you for taking time to talk with me about my technology on
the above subject contact/contactless RFID smart card - COMBICHIP.

I am a plastic card consultant - a knowledgeable innovative pro-
fessional with over 40 years of progressive experience. Please
review my resume.

In 1995 I developed a plastic radio frequency identification card for
Motorola in San Jose, California. This proximity card is now being
manufactured by your company. Now I am interested in making the sub-
ject card for you. I have a patent pending on this card and am very
excited about it.

- * I would use PVC with up to 30, or more, cards per
sheet and can use 12 sheets, or more, per opening
in the laminator.
- * The card can have multi color offset printing on
each side under overlaminata film.
- * The card can have a flush mag stripe applied with
overlaminata sheets multi up or can be applied
individually.
- * I can apply dye sublimation printing on the cards.

Since I left San Jose I have developed a method to make a ISO
RFID smart card and have a "perfect" prototype to show. I
have a patent pending on this card.

I look forward to a meeting to discuss our mutual goal in the
manufacture of subject COMBICHIP smart card.

Sincerely,

Keith Leighton
Keith Leighton
Fax: 216-960-2335

PS: Per your request, I am sending my resume

EXHIBIT 71

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

- - - - -
LEIGHTON TECHNOLOGIES, LLC,)

plaintiff,)

vs.) Case No.

) 04 Civ. 02496 (CM)

OBERTHUR CARD SYSTEMS, S.A.)

and OBERTHUR CARD SYSTEMS)

OF AMERICA CORP.,)

defendants.)
- - - - -

(Volume III - pages 522 through 875)
- - - - -

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KEITH LEIGHTON, a witness herein, called by the
defendants as if upon cross-examination, and
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pursuant to Notice of Deposition and pursuant to
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contained, on Monday, the 23rd day of October,
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Cleveland, County of Cuyahoga and the State of
Ohio.

Tackla & Associates

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1 application as to how you would achieve that?

2 A By making a -- the pre-lam, I went to a
3 place where I was familiar with the laminator
4 because I did a lot of modifications on that
5 laminator.

6 Q Right.

7 A CSI happened to be formerly 2B Systems.

8 Q Okay.

9 A I was familiar with the equipment. And by
10 making my first test, I used the top platen of
11 that laminator where I knew I could -- I could
12 bring it to a touch with the pads in it not
13 crushing but touching the plates, where I could
14 have heat from the top and heat from the bottom
15 with zero pressure --

16 Q Okay.

17 A -- on the chip.

18 Q And is that -- is that something that
19 occurred to you before you filed your
20 provisional application, of course, that
21 applying heat with no pressure?

22 A Yes.

23 Q And that was after you left Motorola?

24 A Yes.

25 Q And that just came into your head without

1 any experimental work?

2 A I had help. God was with me.

3 Q Okay. And what else --

4 A This idea come from the Lord, I'll tell
5 you.

6 Q What other -- what other process steps did
7 you come up with prior to when your provisional
8 patent application was filed? Did you think
9 about applying an increased pressure during the
10 cooling phase?

11 A I wrote it all out on two pages in
12 ballpoint ink and then I didn't vary from
13 that --

14 Q Okay.

15 A -- in making my --

16 Q Okay.

17 A -- card. I stuck to that.

18 Q Let's take -- let's take a break for lunch
19 and then we'll talk about that.

20 BY MR. DeFRANCO:

21 Q Okay. Mr. Leighton, before we took a lunch
22 break you mentioned a two page document that you
23 had jotted down on a pad some of your
24 thoughts --

25 A Right.

EXHIBIT 72

1 *****CONFIDENTIAL DEPOSITION*****
2 IN THE UNITED STATES DISTRICT COURT
3 SOUTHERN DISTRICT OF NEW YORK
4 Leighton Technologies, LLC,)
5 Plaintiff-Counterclaim)
6 Defendant,) Case No.
7 -vs-) 04Civ
8 Oberthur Card Systems, S.A.,) 2496 (CM)
9 Defendant-Counterclaim)
10 Plaintiff.)

11 - - - oOo - - -

12 Continued deposition of KEITH R.
13 LEIGHTON, a witness herein, called by the
14 Defendant- Counterclaim Plaintiff, as if
15 upon cross-examination under the statute,
16 and taken before Luanne Stone, a Notary
17 Public within and for the State of Ohio,
18 pursuant to the issuance of notice and
19 subpoena, and pursuant to the further
20 stipulations of counsel herein contained, on
21 Monday, the 10th day of October, 2005 at
22 9:00 o'clock A.M., at the Renaissance Hotel,
23 the City of Cleveland, the County of
24 Cuyahoga and the State of Ohio.

25 *****CONFIDENTIAL DEPOSITION*****

1 back.)

2 THE WITNESS: Yes, remembering all
3 of its contents, I don't remember, but I do
4 recall seeing it and signing it.

5 BY MR. JACOBS:

6 Q: And do you consider yourself bound by
7 the terms of this agreement, Exhibit 110?

8 MR. GUTKIN: It calls for a legal
9 conclusion. The witness can answer.

10 MR. JACOBS: Thank you.

11 THE WITNESS: I believe I would be
12 bound to it, yes.

13 BY MR. JACOBS:

14 Q: Now, prior to going to Motorola, you
15 had no experience, had you, with regard to
16 laminating electronic elements into a
17 plastic laminated card?

18 A: No, I hadn't done testing, but prior
19 to going there, they were asking me if I
20 would -- would have the knowledge of putting
21 a hard object in a plastic card.

22 Q: And what was your answer to that
23 question?

24 A: I believe I could do that.

25 Q: And had you done that before going to

TACKLA & ASSOCIATES

1 Q: Okay. Now, prior to going to
2 Motorola, had you ever given any thought of
3 laminating any electronic element into a
4 plastic card?

5 A: I don't even recall that.

6 Q: You don't recall that?

7 A: No. I've been in plastic cards
8 since 1970, and all the things
9 that I've -- I've been in a lot of research
10 and development in plastic cards.

11 Q: Yeah, but as you sit here today, you
12 cannot recall ever considering laminating an
13 electronic element into a plastic card
14 before your visit to Motorola?

15 A: I -- I don't believe I did try to put
16 electronic elements in -- these were not at
17 my disposal.

18 Q: All right, and you not only -- you
19 didn't -- you -- let me rephrase the
20 question. I'm sorry. I'm having a little
21 difficulty. I can understand why you're
22 having difficulty answering.

23 Prior to visiting Motorola, you had
24 never given thought to laminating any
25 electronic element into a plastic card,

TACKLA & ASSOCIATES